

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

HANJIN SHIPPING CO., LTD.,<sup>1</sup>

Debtor in a Foreign Proceeding.

Case No. 16-27041 (JKS)

Chapter 15

Honorable John K. Sherwood

**RESERVATION OF RIGHTS OF AT&T CORP. AND DIRECTV, LLC  
WITH RESPECT TO PROPOSED CARGO PROTOCOL**

TO: HONORABLE JOHN J. SHERWOOD  
UNITED STATES BANKRUPTCY JUDGE

AT&T Corp. and DIRECTV, LLC (together, “AT&T”), the beneficial owner of certain cargo currently in the possession of the above-captioned chapter 15 debtor (the “Debtor”), hereby files this reservation of rights with respect to the protocol proposed by the Debtor’s foreign representative, Tai-Soo Suk (the “Foreign Representative”), to permit beneficial cargo owners such as AT&T to obtain custody and control of their cargo (the “Proposed Cargo”).

<sup>1</sup> The last four digits of Hanjin Shipping Co., Ltd.’s Business Registration Number are 1835. The Debtor’s main corporate and mailing address is Hanjin Shipping Bldg., 25 Gukjegeumyung-Ro 2-Gil, Yeongdeungpo-Gu, Seoul 07327, Korea.

Protocol”). A copy of the Proposed Cargo Protocol was filed as Exhibit H to the Foreign Representative’s supplemental submission in support of provisional relief [Docket No. 80].

AT&T hereby reserves its procedural, substantive and other rights (i) in connection with the Proposed Cargo Protocol, including the right to raise arguments at or prior to the hearing thereon, (ii) to object to, or seek clarification of, the Proposed Cargo Protocol, or any portion thereof, and (iii) to take any measures available under any governing agreement and applicable law to protect and obtain custody and control of its cargo currently in the possession of the Debtor.

Dated: September 9, 2016

Respectfully submitted,

TRENK, DiPASQUALE,  
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